

GODLEWSKI V. ALVEAR, No. 3:24—CV—00344 (JKM)
DEFS.' MOT. TO DISMS.

EXHIBIT “A”

<p>PHILIP GODLEWSKI,</p> <p>v.</p> <p>EDUARDO NICOLAS ALVEAR GONZALEZ, <i>AKA</i> ALVEAR GONZALEZ EDUARDO NICOLAS, <i>AKA</i> NICOLAS ALVEAR; and GOOD LION TV, LLC,</p>	<p>Plaintiff,</p> <p>Defendants</p>	<p>CIVIL ACTION—LAW & EQUITY <i>(HON. JULIA K. MUNLEY)</i></p> <p>JURY TRIAL DEMANDED</p> <p>No.: 3:24—CV—00344</p>
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COMMONWEALTH OF PENNSYLVANIA)
) SS.
COUNTY OF LACKAWANNA)

1. My name is Eduardo Nicolas Alvear Gonzalez and I am also known as Nicolas Alvear. I am a citizen of the State of Tennessee and am domiciled at 1009 8th Avenue S., City of Nashville, County of Davidson. I have personal knowledge of the facts herein and, if called as a witness, could and would testify completely and truthfully thereto.
2. I am over the age of eighteen (18) and suffer no legal disabilities or infirmities that would prevent me from testifying completely and truthfully.
3. I am the Chief Executive Officer and duly authorized agent of Good Lion TV, LLC, which is a limited liability company organized and existing under the laws of the State of Wyoming with Company ID Number 2022—001070783 (the “Company”).

4. The Company's Registered Agent is listed as Cloud Peak Law, LLC, with an address of 1095 Sugar View Drive, Ste. 500, Sheridan, Wyoming 82801, and I have specific knowledge of the Company's business activities including where all taxes and income derived from same occurs, which is in my domiciled State of Tennessee.
5. I operate as online broadcaster and content creator on several different social media sites where I speak on matters of political, cultural and social public concern and am familiar with Philip Godlewski ("Mr. Godlewski") through his online presence on the same and/or similar social media sites.
6. After reviewing several articles related to Mr. Godlewski's civil lawsuits filed in Lackawanna County, Pennsylvania against the Scranton Times-Tribune and Brienna L. DuBorgel, respectively, as well as the documents filed in those cases and made available on Lackawanna County's public docket including sworn affidavits and testimony of Brienna L. DuBorgel, deposition and hearing testimony of Mr. Godlewski and Dori Gallagher, Mr. Godlewski's criminal record, and other public and/or verified documents related to Mr. Godlewski's criminal history, I desired to make a documentary film about him, working on same throughout 2023.
7. In early 2024, my Company and I published "The Greatest Fraud on Earth: the Phil Godlewski Story," a seventy-minute documentary film investigating Mr. Godlewski's criminal history and current status as a social media broadcaster using information I gathered from various documents filed in his civil lawsuits and procured through the Lackawanna County public docket service as well as information culled from various news media articles that addressed Mr. Godlewski's civil lawsuits.
8. My Company and I advertise the film mentioned in the above-paragraph through social media channels and a small physical advertising campaign in Pennsylvania including a poster depicting the film's title. A true and accurate depiction of one of these posters is attached hereto and marked as Exhibit "1.A".
9. I am familiar with the allegations contained in Mr. Godlewski's Complaint against me and my Company filed on February 28, 2024 in the United States District Court for the Middle District of Pennsylvania docketed to number 3:24—CV—00344 and am the person identified in the caption attached thereto.
10. Neither I, nor my Company or its agents, have any physical office, connections, family members, friends or other continued and/or systemic presences in the Commonwealth of Pennsylvania.

11. Neither I, nor my Company or its agents, have any employees, agents or independent contractors employed in the Commonwealth of Pennsylvania nor have I or my Company, paid any taxes to the Pennsylvania Department of Revenue related to any business dealings, contracts or particular events occurring in the Commonwealth of Pennsylvania.
12. Neither I, nor any agents of my Company, have ever physically visited the Commonwealth of Pennsylvania or have otherwise been physically present therein.
13. Neither I, nor my Company or its agents, have any further specific contacts with the Commonwealth of Pennsylvania other than my social media posts, aforementioned poster sales, and online sales of documentary films, including the aforementioned film about Mr. Godlewski, which are all available to everyone in the online community.
14. Neither I, nor my Company or its agents, have deliberately focused any respective business activities toward the Commonwealth of Pennsylvania other than those mentioned herein and neither reasonably foresaw Mr. Godlewski filing a civil lawsuit naming me and my Company as Defendants in the United States District Court for the Middle District of Pennsylvania.

Eduardo Alvear

EDUARDO NICOLAS ALVEAR GONZALEZ, AKA
NICOLAS ALVEAR

Subscribed and sworn to before me

this 3RD day of APRIL, 2024

digitally via ZOOM®

STEFANIE PARRY
NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Stefanie T. Parry, Notary Public
Lackawanna County
My commission expires September 9, 2026
Commission number 1427032
Member, Pennsylvania Association of Notaries